

Like all of the proposals to revise the Morse Code requirement for Amateur licensing, this proposal has some merit and some silliness.

FISTS represents only a narrow slice of Amateur Licensees, and some of its proposal is self-serving and not in the general good of the Amateur Radio Service. There is simply no need for 12 WPM morse code as a requirement for access to Extra-class frequency spectrum, for example.

I think that rather than amending the testing/licensing requirements piecemeal, it is better to make the changes in concert with a broader revision of the rules governing the Amateur Service. By doing this, the FCC could accomplish both substantive and housekeeping changes in a single rulemaking, at a great cost saving to the taxpayer.